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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In re

Amendment of the Commission's Rules  
to Establish a Single AM Radio  
Stereophonic Transmitting  
Equipment Standard

ET Docket  
No. 92-298

PETITION FOR STAY PENDING APPEAL

Under the Commission's Report and Order dated November 23, 1993,<sup>1</sup> users of the Kahn independent sideband AM Stereo system must discontinue AM stereo transmissions<sup>2</sup> effective March 21, 1995.<sup>3</sup> That order was adopted by the Commission in response to

<sup>1</sup>8 F.C.C. Rcd 8216, 74 R.R.2d 244, reaffirmed, 9 F.C.C. Rcd 1907, 75 R.R.2d 208 (1994), appeal pdg., D.C. Cir. No. 94-1078 (filed February 7, 1994)

<sup>2</sup>The Commission's order specifically provided that stations using Kahn's POWER-side™ system can maintain such operation, as the system complies with the rules of the Commission, as long as stereophonic programming is excluded. Order, ¶ 22, id. at 8220, 74 R.R. 2d at 248.

<sup>3</sup>Section 73.128 of the Commission's rules provides in pertinent part:

§73.128. AM stereophonic broadcasting. - (a) An AM broadcast station may, without specific authority from the FCC, transmit stereophonic programs upon installation of type accepted stereophonic transmitting equipment and the necessary measuring equipment to determine that the

Section 214 of P.L. 102-538 requiring the Commission to adopt a single AM radio stereophonic transmitting standard within a year of the date of enactment of the P.L. 102-538.

To avoid unnecessary disruption of existing broadcast service, the Commission should stay the effective date of the rule pending decision of petitioner's appeal presently before the U.S. Court of Appeals for the District of Columbia Circuit. Oral argument has been set for March 13, 1995.

**Irreparable Injury**

Mandatory discontinuance of independent sideband stereo transmission would significantly disrupt existing broadcast service from a number of leading AM Stereo stations, such as KSL in Salt Lake City and WQEW in New York City, both operating at 50 kilowatts. Such discontinuance of existing service to the public would unnecessarily inconvenience and disrupt such stations' operations and the listeners they serve.

It also will visit irreparable harm on not only the marketability of AM Stereo but also on AM's reputation as a viable competitor of FM for music transmission. While the

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stereophonic transmission conform to the modulation characteristics specified in paragraphs (b) and (c) of this section. Stations transmitting stereophonic programs prior to March 21, 1994 may continue to do so until March 21, 1995 as long as they continue to comply with rules in effect prior to March 21, 1994.

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- (c) Effective on December 20, 1994, stereophonic transmission shall conform to the following additional modulation characteristics: \* \* \*

penetration of receivers capable of receiving KCI (independent sideband) stereo reception, including receivers manufactured by Sony, Sanyo and Sansui, are small in number,<sup>4</sup> nevertheless, that number is reportedly in the hundreds of thousands of receivers, and such receivers bear a high price because they are capable of superior long distance reception by devotees of AM Stereo music via Kahn stereo on a number of quality stations. For example, there is a regular audience in Boston and North Carolina for the stereophonic transmission of WQEW, and KSL reports listeners to its Salt Lake City Tabernacle broadcasts all over the intermountain west and along the entire West Coast of California.

If the Commission were to force these broadcasters to discontinue independent sideband AM stereo transmissions, it would be very difficult to rekindle interest in AM stereo in the event Kahn's appeal is, as he expects, successful.

#### Likelihood of Success on Merits

There is an established public policy against disrupting existing service to listeners while appeals from Commission action are pending. See RKO General (WNAC-TV), 89 F.C.C.2d 361, 365, 50 R.R. 2d 1566, 1569 (1982) (based in part on the commission's "ultimate responsibility to insure a continuation of service"), citing cases id. at 366 n. 17, 50 R.R. 2d at 1570 n.

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<sup>4</sup>In a now pending suit in the Eastern District of New York Kahn has alleged that Motorola's antitrust violations have caused the discontinuance of the manufacture and marketing of receivers compatible with Kahn's transmission system. The Complaint requests temporary and permanent injunction requiring Motorola to discontinue its putative unlawful activities in the AM Stereo industry.

17; Section 10(d) of the APA, now 5 U.S.C. § 705 (relief pending review "when justice so requires"). In the face of such a strong policy, the petitioner's burden to show likelihood of success on the merits is a modest one. See WMATC v. Holiday Tours, 182 U.S. App. D.C. 220, 222-24, 559 F.2d 841, 843-45 (1977).

On its appeal petitioner will show:

The Commission, before adopting Motorola's AM stereo system as a national standard, failed to perform its legal duty to investigate and consider alleged violations of the antitrust laws involving Motorola's system, which allegations were unsuccessfully challenged by Motorola, and are to be tried, in a private antitrust action in a U.S. district court.

The Commission, in favoring Motorola's system because of its alleged marketplace dominance, erred in refusing to consider judicially sealed documents proffered by Kahn to show that Motorola achieved such dominance through alleged violations of the antitrust laws.

The Commission incorrectly applied "reverse FOIA" doctrine in rejecting Petitioner Kahn's conditional proffer of sealed evidence of antitrust violations involving Motorola's system.

The Commission's evaluation of the relative merits of the two competing systems was invalidated by the Commission's failure to consider the comments filed with it by independent engineers and broadcasters demonstrating the technical defects inherent in the Motorola system, and, in any event, the Commission's evaluation was arbitrary, capricious, and an abuse of discretion.

The Commission's ascribing to Motorola's system a "strong preference demonstrated in the market place," despite its use by less than ten percent of AM broadcasters, was arbitrary and capricious.

### The Public Interest

Failure to maintain independent sideband stereo would prejudice the Commission's policy of revitalizing AM radio. AM Stereo has actually suffered from too much "hype." To introduce AM Stereo to listeners that are persuaded to take at least one "listen" and that "listen" just confirms their bias, is clearly counterproductive. In other words, to so demonstrate a new system with "platform motion" and other unacceptable artifacts to listeners just underscores their bias that AM is only suitable for voice quality, low-fidelity transmissions.

AM Radio's only defense against that unfair reputation is the quality of stations now transmitting in the Kahn AM Stereo mode. These stations prove, not only to engineers but to the public, that AM radio is capable of high quality stereo transmission -- not just under ideal listening conditions, but under terrain and propagation conditions where FM cannot compete beyond a relatively few miles. And AM radio can offer such quality service at all times of the day and not just when the "sun is shining." Accordingly, an interruption of the transmission of quality signals in major cities can and will create irrevocable harm that may make it impossible to retrieve the reputation of AM radio.

Since emissions by stations utilizing the Kahn equipment do not in any way increase interference to adjacent or co-channel stations, their use of this system does not disadvantage other

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broadcasters and the public they serve. Indeed, since the petitioner has provided the Commission data (confirmed by reputable consultants and manufacturers) that the Motorola system creates additional interference beyond that created by the Kahn equipment,<sup>5</sup> stating the Commission's Order will end up reducing interference over what might occur if the stereo broadcaster found that the demand for stereo programming overrode its loss of service considerations and he switched systems.

Deferral of the effective date of that part of the rule would by no means impair any goal of the Commission in fostering AM stereo using Motorola's system. A recent telephone sample commissioned by Kahn Communications shows that only 55.9 percent of the AM stations on Motorola's own list of Motorola equipped stations (which only totalled 591 stations) are actually broadcasting the Motorola signal.<sup>6</sup> Comments by station personnel indicated that the stations had discontinued use because the Motorola's system was technically unsatisfactory. A copy of the survey report is attached.

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<sup>5</sup>Even though the period allowed for comments was unusually short, a number of the concerned engineers filed comments under the Commission's Report and Order dated November 23, 1993. Almost all of these submissions provided significant engineering information, not mere form letters. These submissions came from leading consulting engineers, manufacturers, networks, and broadcast engineers. The majority of these comments strongly supported Kahn's system over the Motorola System.

<sup>6</sup>A sample of 195 stations, approximately 1/3 of Motorola's list, printed in S. Hrg. 102-740 at 111-14 (March 11, 1992), and made a part of the record in this rulemaking, was drawn of 195 respondents, 86 reported that they had discontinued broadcasting in stereo using the Motorola system during the survey period (April 28, 1994).

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Conclusion

Accordingly, the public interest requires that the Commission stay its order requiring stations using the Kahn AM stereo exciters, models STR77 and STR84, to cease stereo operations at least until the U.S. Court of Appeals for the District of Columbia Circuit rules on the petitioner's pending appeal from the orders in Docket No. 92-298.

Respectfully submitted,



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October 28, 1994



Verification

I hereby certify under penalties of perjury that the statements of fact in the foregoing petition for stay to the extent they are not subject to official notice are true and correct.

  
Leonard R. Kahn

October 28, 1994

**MOTOROLA USEAGE SURVEY**  
*of the MOTOROLA list of Motorola users.*

**APRIL 28, 1994**

***ARRANGED BY STATE***

CALL	FREQ	CITY	ST	Motorola	CONTACT	TITLE	PHONE
KHAR	590	ANCHORAGE	AK	NO	KERRI KERRIGAN	CE	907-522-3422
WJOX	890	BIRMINGHAM	AL	NO	WILLIAM JENKINS	PD	205-945-4848
WFPA	1400	FT. PAYNE	AL	NO	PAUL FINK	GM	205-845-7721
WGOK	900	MOBILE	AL	NO	MATT HATTA	PD	205-432-8661
WQRX	870	VALLEY HEAD	AL	YES	BILL CLARK	PD	205-635-6284
KFSA	950	FT. SMITH	AR	NO	DAVID BURDUE	PD	501-646-6700
KXAM	1310	MESA	AZ	NO	CINDY CONFORTI	STMGR	602-423-1310
KAZM	780	SEDONA	AZ	YES	C.J. SELLS	GM	602-282-4154
KTKT	990	TUCSON	AZ	NO	CHRIS JONES	CE	602-622-6711
KCWR	550	BAKERSFIELD	CA	YES	PERRY GEISER	CE	805-326-1011
KPUP	540	CARMEL VALLEY	CA	NO	JOSE DIAZ	GM	408-758-5625
KJQI	540	COSTA MESA	CA	NO	MIKE JOHNSON	CE	800-248-5546
KIEV	870	GLENDALE	CA	YES	HAL WILLIAMS	CE	213-245-2388
KAVL	610	LANCASTER	CA	NO	BILL BUENING	CE	805-942-1121
KKHJ	930	LOS ANGELES	CA	YES	JAMES BLAKELY	CE	213-461-9300
KNX	1070	LOS ANGELES	CA	YES	KENT	ENG	213-460-3000
KTNO	1020	LOS ANGELES	CA	YES	BOB MOORE	CE	213-465-3171
KTRB	860	MODESTO	CA	NO	PETE PAPPAS, JR	PD	209-526-8600
KABL	960	OAKLAND	CA	NO	ROSS MARTIN	CE	415-788-5225
KUTY	1470	PALMDALE	CA	YES	PIERRE PIERLUSSI	CE	805-947-3107
KCAL	1410	REDLANDS	CA	YES	JORGE PEREIRA	PD	909-825-5020
KRAK	1140	SACRAMENTO	CA	YES	BRUCE HIRSCH	CE	916-923-9200
KCBQ	1170	SAN DIEGO	CA	NO	RICH BR. ROBBIN	PD	619-286-1170
KOFY	1050	SAN MATEO	CA	YES	MARTY MARKS	CE	415-821-2020
KSPE	1490	SANTA BARBARA	CA	YES	HERADO LORENZ	PD	805-965-1490
KKZZ	1400	SANTA PAULA	CA	NO	AL TADDEO	CE	805-483-1000
KYGO	950	DENVER	CO	YES	BRAD HART	ENG	303-321-0950

CALL	FREQ	CITY	ST	Motorola	CONTACT	TITLE	PHONE
KGHF	1350	PEUBLO	CO	YES	JOYCE DUMEYER	STMGR	719-542-5570
WICC	600	BRIDGEPORT	CT	YES	ED BUTLER	CE	203-366-6000
WXCT	1220	HAMDEN	CT	YES	MARTY WILSON	PRES	203-288-8282
WNEZ	910	NEW BRITAIN	CT	NO	BOB GRAY	CE	203-678-9100
WKZE	1020	SHARON	CT	NO	DALE JONES	OPMGR	203-364-5800
WWRC	980	WASHINGTON	DC	NO	ED HENKEL	CE	301-587-4900
WDEL	1150	WILMINGTON	DE	YES	BOB MERCER	PD	302-478-2700
WRUF	850	GAINESVILLE	FL	NO	DON RICE	CE	904-392-0771
WKIZ	1500	KEY WEST	FL	NO	TIM SWOFFORD	PD	305-294-2523
WWCL	1440	LEHIGH ACRES	FL	NO	CASTO ZAPATO	CE	813-368-3939
WIOD	610	MIAMI	FL	NO	TIM BEHAN	CE	305-759-4311
WWFE	670	MIAMI	FL	NO	ED RODRIQUEZ	CE	305-642-4422
WEBY	1330	MILTON	FL	YES	DAVE JOHNSON	PD	904-623-1330
WGTO	540	ORLANDO	FL	NO	MARK EDWARDS	GM	407-656-5440
WGNE	590	PANAMA CITY	FL	YES	JIM DOOLEY	OPDIR	904-769-6163
WFNS	910	PLANT CITY	FL	NO	MARK GUTHRIE	CE	813-620-9100
WSUN	620	ST. PETERSBURG	FL	NO	DAVID SOLINSKE	CE	813-576-1073
WRFC	960	ATHENS	GA	YES	HUGH CHRISTIAN	GM	706-549-6222
WGKA	1190	ATLANTA	GA	YES	DIANE WATSON	ENG	404-231-1190
WSB	750	ATLANTA	GA	NO	RON WILSON	CE	404-897-7500
WGAC	1580	AUGUSTA	GA	NO	KEITH BECKHAM	PD	706-855-8484
WSTH	540	COLUMBUS	GA	NO	TONY COOK	PD	706-596-5100
WDUN	550	GAINESVILLE	GA	NO	JOE WILLIAMS	OPMGR	404-532-9921
WMGA	580	MOULTRIE	GA	NO	ERIC ROWAN	GM	912-985-0580
WTSH	1360	ROME	GA	NO	BOB GREEN	PD	706-291-9496
WPAX	1240	THOMASVILLE	GA	YES	MR. ROBINSON	GM	912-226-1241
WCOP	1350	WARNER ROBINS	GA	YES	BILL BRUTON	GM	912-923-3416

CALL	FREQ	CITY	ST	Motorola	CONTACT	TITLE	PHONE
KIKI	830	HONOLULU	HI	YES	JER. VAROUJEAN	CE	808-531-4602
KGEM	1140	BOISE	ID	NO	MAC McGAHA	CE	208-344-3511
KWIK	1240	POCATELLO	ID	NO	JESSE YNDA	CE	208-232-8129
WBBM	780	CHICAGO	IL	YES	MARIO ACETO	ENG	312-844-6000
WLS	890	CHICAGO	IL	YES	PAM MURPHY	ENG	312-984-0890
WSCR	820	CHICAGO	IL	NO	JOHN FREEBERG	CE	312-777-1700
WKDC	1530	ELMHURST	IL	NO	ROB QUARRELS	STMGR	708-530-1530
WDDD	810	JOHNSON CITY	IL	NO	DUTCH DOELITSCH	STMGR	618-997-8123
WMBD	1470	PEORIA	IL	YES	ROGER WELLS	ENG	309-688-3131
WMAY	970	SPRINGFIELD	IL	YES	DAN RUSSELL	PD	217-629-7077
WCSI	1010	COLUMBUS	IN	NO	JOHN MATHIS	CE	812-372-4448
WQHK	1380	FT. WAYNE	IN	YES	ED DIDIER	CE	219-447-5511
WNDE	1280	INDIANAPOLIS	IN	NO	PAMELA FERRIN	PD	317-257-7565
WRAY	1250	PRINCETON	IN	YES	HAROLD BASS	CE	812-386-1250
KCRG	1600	CEDAR RAPIDS	IO	YES	PAM SORTLAND	ENG	319-398-8422
KDMI	1460	DES MOINES	IO	NO	JERRY SLAY	STMGR	515-274-4968
KWSL	1470	SIOUX CITY	IO	YES	KEVIN KOLLINS	PD	712-255-1470
KFDI	1070	WICHITA	KS	YES	SCOTT PIPER	PD	316-838-9141
WKIC	1390	HAZARD	KY	YES	PAULA CAMPBELL	PD	606-436-2121
WVLK	590	LEXINGTON	KY	YES	TOM DEVINE	CE	606-253-5900
WWKY	790	LOUISVILLE	KY	YES	JERRY SHEA	CE	502-589-0107
WFXV	1490	MIDDLESBORO	KY	YES	RHONDA RAINES	PD	606-248-1560
WNVL	1250	NICHOLASVILLE	KY	NO	BILL LANEY	OWNER	606-885-6031
WDXR	1450	PADUCAH	KY	YES	EMILY BROWN	OPMGR	502-443-1000
WEKY	1340	RICHMOND	KY	NO	RICH MIDDLETON	PD	606-623-1340
WXOK	1460	BATON ROUGE	LA	YES	PAUL BURT	CE	504-926-1106
WFPR	1400	HAMMOND	LA	NO	MIKE PATTON	CE	504-542-1400

CALL	FREQ	CITY	ST	Motorola	CONTACT	TITLE	PHONE
KVOL	1330	LAFAYETTE	LA	YES	DAVID GRAICHEN	CE	318-233-1330
KNOE	540	MONROE	LA	YES	JERRY HARKINS	CE	318-388-8888
KXLA	990	RAYVILLE	LA	NO	DERRICK MATION	PD	318-728-6990
KIOU	1550	SHREVEPORT	LA	NO	DON CRAWFORD	PD	318-222-0272
KTIB	640	THIBODAUX	LA	NO	MELISA ROUSSEL	PD	504-447-9006
WMEX	1150	BOSTON	MA	YES	PAUL SHULINS	CE	617-542-0241
WHYN	580	SPRINGFIELD	MA	YES	KEN JONES	CE	413-781-1011
WUOK	1240	WEST YARMOUTH	MA	NO	CARY PAHIGIAN	STMGR	508-775-7400
WANN	1190	ANNAPOLIS	MD	YES	LES JAMISON	CE	410-269-0700
WTRI	1520	BRUNSWICK	MD	NO	PAT STATON	STMGR	301-834-6998
WFMD	930	FREDERICK	MD	NO	ROGER LIDE	CE	301-663-4181
WLAM	870	GORHAM	ME	NO	BOB SELLECK	OPMGR	207-878-8787
WAAM	1600	ANN ARBOR	MI	YES	KEN KELLY	PD	313-971-1600
WJR	760	DETROIT	MI	NO	TONY BUTLER	CE	313-875-4440
WOOD	1300	GRAND RAPIDS	MI	YES	DON MISSAD	CE	616-459-1919
WITL	1010	LANSING	MI	YES	KEVIN LARKE	CE	517-393-1010
WHND	560	MONROE	MI	YES	TOM	CE	313-398-7600
WSAM	1400	SAGINAW	MI	NO	BILL ANDERS	PD	517-752-8161
WCSY	940	SOUTH HAVEN	MI	NO	JOE JASON	STMGR	616-637-6397
KASM	1150	ALBANY	MN	YES	STEVE GRETSCH	GM	612-845-2184
WCCO	830	MINNEAPOLIS	MN	YES	JOE JONCAS	CE	612-370-0811
KNSI	1450	ST. CLOUD	MN	YES	GREG BOMGAARS	CE	612-251-1450
WDAF	610	KANSAS CITY	MO	YES	KEN DILLARD	CE	816-931-6100
WHB	710	KANSAS CITY	MO	NO	BOB TERRY	GM	816-221-7170
KGBX	1400	SPRINGFIELD	MO	YES	MARK THOMPSON	PD	417-869-1059
KMOX	1120	ST. LOUIS	MO	YES	JIM SCOTT	CE	314-621-2345
WCJU	1450	COLUMBIA	MS	YES	ALICE ROBINSON	PD	601-736-2616

CALL	FREQ	CITY	ST	Motorola	CONTACT	TITLE	PHONE
WZRZ	1590	JACKSON	MS	NO	CURT SHERWOOD	STMGR	601-982-1067
WALT	910	MERIDIAN	MS	NO	VAN MACK	OPMGR	601-693-2661
WQBC	1420	VICKSBURG	MS	NO	ED STROUP	GM	601-636-1108
KMON	560	GREAT FALLS	MT	NO	JIM SENST	GM	406-761-7600
WZKY	1580	ALBEMARLE	NC	YES	BILL NORMAN	GM	704-983-1580
WATA	1450	BOONE	NC	YES	O. THOMLINSON	GM	704-264-2411
WAQS	610	CHARLOTTE	NC	NO	BILL ELLIOTT	CE	704-338-9970
WGBR	1150	GOLDSBORO	NC	YES	BOB HILL	OPMGR	919-736-1150
WMAP	1060	MONROE	NC	YES	RAY SCOTT	PD	704-283-6705
WNNC	1230	NEWTON	NC	YES	DAVE LINGAFELT	GM	704-464-4041
WPJL	1240	RALEIGH	NC	YES	DAVE THOMAS	PD	919-834-8401
WOHS	730	SHELBY	NC	YES	MILT BAKER	PD	704-482-3966
WSJS	600	WINSTON SALEM	NC	YES	TED LEVIN	CE	910-727-8826
KBMR	1130	BISMARCK	ND	YES	BRAD SCHULTZ	ENG	701-255-1234
KEYZ	660	WILLISTON	ND	YES	LEE HALDERSON	PD	701-572-5371
KMEM	1480	LINCOLN	NE	NO	DALLAS MICHAEL	OPMGR	402-476-3222
WJLK	1310	ASBURY PARK	NJ	NO	STEVE ZETSCHKE	GM	908-774-7700
WCTC	1450	NEW BRUNSWICK	NJ	YES	DAN FLAT	PD	908-249-2600
KRZY	1450	ALBUQUERQUE	NM	YES	JIM PATRICK	PD	505-884-5833
KYVA	1230	GALLOP	NM	YES	REX LEE	CE	505-863-6851
KVEG	840	LAS VEGAS	NV	NO	TERRY JOHNSTON	GM	702-262-6600
KOZZ	1450	RENO	NV	NO	DAVESHERBOURNE	CE	702-329-9261
WGR	550	BUFFALO	NY	NO	DOUG WOLF	CE	716-881-4555
WELM	1410	ELMIRA	NY	YES	JEFF MURRAY	PD	607-733-5626
WEVD	1050	NEW YORK	NY	YES	JOSE NORTHOVER	PD	212-777-7900
WHAM	1180	ROCHESTER	NY	YES	RANDY ORBAKER	CE	716-454-4884
WHEN	620	SYRACUSE	NY	YES	ROY TAYLOR	CE	315-457-6110

CALL	FREQ	CITY	ST	Motorola	CONTACT	TITLE	PHONE
WBCO	1540	BUCSTYRUS	OH	NO	JIM RADKE	PD	419-562-2222
WRDZ	1260	CLEVELAND	OH	YES	BILL WEBB	PD	216-528-8989
WONE	980	DAYTON	OH	YES	JEFF BENNET	CE	513-224-1137
WMOH	1450	HAMILTON	OH	NO	KURT RADELE	CE	513-863-1111
WSPD	1370	TOLEDO	OH	YES	BILL ROSINI	CE	419-244-8321
KKAJ	1240	ARDMORE	OK	YES	STEVE FOSTER	PD	405-226-0421
WKY	930	OKLAHOMA CITY	OK	YES	DEN DEMICHAEL	GM	405-478-2930
WBBZ	1230	PONCA CITY	OK	YES	RANDY BISHOP	PD	405-765-6607
KUIK	1360	HILLSBORO	OR	NO	BOB THOMPSON	PD	503-640-1360
KEX	1190	PORTLAND	OR	YES	BYRON SWANSON	ENG	503-225-1190
WXKW	1470	ALLENTOWN	PA	NO	CHRISTIN BORGER	VPGM	610-264-4040
WFBG	1290	ALTOONA	PA	YES	STEVE KELSEY	PD	814-943-1136
WCHA	800	CHAMBERSBURG	PA	YES	RICK ALEXANDER	PD	717-264-7121
WHP	580	HARRISBURG	PA	NO	MIKE NEFF	PD	717-540-8800
WCCS	1160	HOMER CITY	PA	YES	MARK BERTIG	GM	412-479-1160
WLPA	1490	LANCASTER	PA	YES	DAN KNIGHTON	PD	717-653-0800
KYW	1060	PHILADELPHIA	PA	YES	BILL ROSWELL	PD	215-238-4700
WWSW	970	PITTSBURGH	PA	YES	GARY MARINCE	PD	412-323-5300
WEEU	850	READING	PA	YES	JO PAINTER	PD	215-376-7335
WKOK	1070	SUNBURY	PA	YES	JOHN KELLER	CE	717-286-5838
WHIM	1110	PROVIDENCE	RI	YES	DIANE FLYNNE	PD	401-941-4700
WNRI	1380	WOONSOCKET	RI	YES	ROGER BOUCHARD	GM	401-274-4270
WJMX	970	FLORENCE	SC	NO	GARY PIERCE	PD	803-667-9569
WMTY	1090	GREENWOOD	SC	YES	VAN LEWIS	PD	803-223-4300
KKLS	920	RAPID CITY	SD	YES	KEVIN PHILLIPS	PD	605-343-6181
WLAR	1450	ATHENS	TN	NO	RANDY SLIGER	PD	615-745-1000
WIVK	990	KNOXVILLE	TN	NO	MIKE HAMMOND	PD	615-588-6511



CALL	FREQ	CITY	ST	Motorola	CONTACT	TITLE	PHONE
WWLX	590	LAWRENCEBURG	TN	YES	ROGER WRIGHT	PD	615-762-6200
WENO	760	NASHVILLE	TN	YES	GREG HUTCHINS	PD	615-242-4240
WTZX	860	SPARTA	TN	YES	WOOD PHILLIPS	PD	615-738-2256
KVET	1300	AUSTIN	TX	NO	DAVE MATYIS	CE	512-495-1300
KBST	1490	BIG SPRING	TX	YES	DAVE WRINKLE	GM	915-267-6391
KDAE	1590	CORPUS CHRISTI	TX	YES	STEVE DE WALT	GM	512-882-4394
KLIF	570	DALLAS	TX	NO	JOHN SHOMBY	PD	214-526-2400
KHEY	690	EL PASO	TX	YES	JIM HAYES	PD	915-566-9301
KGVL	1400	GREENVILLE	TX	NO	MARY STANFIELD	OPMGR	903-455-1400
KFYD	790	LUBBOCK	TX	YES	ALANA RAMPHY	OPMGR	806-794-7979
KNET	1450	PALASTINE	TX	NO	CHRIS PINERO	PD	903-729-6077
KMPQ	980	ROSENBERG	TX	NO	DAN FERNANDEZ	PD	713-342-6601
KKYX	680	SAN ANTONIO	TX	YES	PAUL REYNOLDS	CE	210-615-5400
KOAI	760	SAN ANTONIO	TX	NO	PAT RODGERS	PD	210-736-9700
KNIN	990	WICHITA FALLS	TX	YES	J.J. MC KAY	PD	817-855-6924
KUTR	1320	SALT LAKE CITY	UT	NO	RICH BAUER	CE	801-485-6700
WMZQ	1390	ARLINGTON	VA	NO	MATHA MC KENNEY	PD	202-362-8330
WDVA	1250	DANVILLE	VA	NO	ROBERT TUCKER	PD	804-797-1250
WTAR	790	NORFOLK	VA	YES	PAT MURPHY	PD	804-499-0790
WYVE	1280	WYTHEVILLE	VA	NO	D.W. NICKELL	PD	703-228-3185
WSKI	1240	MONTPELIER	VT	YES	EVELYN BOGGIGGI	STMGR	802-223-5275
KQEU	920	OLYMPIA	WA	NO	DAN MASON	PD	206-491-9200
KJRB	790	SPOKANE	WA	NO	LEE FITZNER	ENG	509-448-1000
WGEE	1360	GREEN BAY	WI	YES	MIKE AUSTIN	PD	414-435-3771
WOGO	680	HALLIE	WI	YES	TODD WAHL	CE	715-723-4626
WLFN	1490	LA CROSSE	WI	NO	RICK STEELE	PD	608-782-8335
WMEQ	880	MENOMONIE	WI	YES	MIKE PHILLIPS	CE	715-235-2112

CALL	FREQ	CITY	ST	Motorola	CONTACT	TITLE	PHONE
WOKY	820	MILWAUKEE	WI	YES	PHIL KLINGLER	CE	414-545-5820
WRIG	1390	WAUSAU	WI	YES	SHANE FINCH	PD	715-355-1814
WWNR	820	BECKLEY	WV	YES	JAY MATTHEWS	PD	304-253-8307
WTCS	1490	FAIRMONT	WV	YES	RAY AMOS	OPMGR	304-368-3700
WAJR	1440	MORGANTOWN	WV	NO	DAVE HARMON	PD	304-296-0029
KLDI	1210	LARAMIE	WY	NO	KELLY RYAN	PD	307-745-7396

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused to be mailed this day by first class mail, postage pre-paid to the following:

Michael Menius, Esq.  
Motorola, Inc.  
1350 Eye street, N.W., Ste. 400  
Washington, D.C. 20005

  
William Malone

Washington, D.C.  
October 31, 1994